HUD's Open Government Plan

Utilizing Transparency, Engagement, and Collaboration to Enhance Mission Results

Contents

Letter from the Secretary

Our Democracy depends on citizens having access to information that allows them to participate more fully in public life, helps them determine priorities for public spending, ensures equal access to justice, and encourages Americans to hold their public officials accountable.

At HUD, I am proud to say that over the past year we have put transparency and accountability front and center with the Recovery Act and the development of our long-term Strategic Plan, a key part of the agency's Transformation Initiative.

Within a month of President Obama taking office HUD was helping to create jobs and build and preserve affordable housing through the Recovery Act. It is vitally important that the American people are fully aware of how their tax dollars are being spent and can hold their federal leaders accountable. Therefore, every dollar of Recovery Act funds HUD spends can be reviewed and tracked at HUD's Recovery Act website. The full text of HUD's funding notices and tracking of future performance of these grants is also available on the site.

In the fall of 2009, HUD embarked on a strategic planning process to set the overall direction of the agency over the next six years. It has been a highly inclusive process—perhaps one of the most inclusive in HUD's history. In creating its FY2010-2015 Strategic Plan, HUD employed a broad engagement strategy to seek input from its many knowledgeable employees, stakeholders and partners - voices critical to HUD's transformation.   The thoughts and ideas of over 1,500 HUD employees and partners have been incorporated into HUD's Strategic Plan. In addition, through an interactive website, HUD Ideas in Action [hyperlink] we provided an opportunity for all 9,500 HUD employees and countless external stakeholders and the public at large to provide input and feedback on the goals and sub-goals proposed for the Strategic Plan.

Now we are taking the next step with the creation of HUD's Open Government Plan.

Our Open Government Plan was developed by a cross-functional team that included representatives from each of HUD's major program and support areas. This team identified actionable and realistic steps the Department could undertake so that open government activities would result in measurable performance benefits for our customers. While the team provided the basic framework for this plan, we would not have been able to develop a comprehensive plan without input from our stakeholders.

We are committed to changing the culture at HUD into a healthy, open, flexible work environment that reflects the values of HUD's mission and better serves you. Now is the time to begin transforming HUD's housing and community development programs, and the administrative infrastructure that supports them, so they are more transparent, streamlined, and **accountable.**

I am committed to not only ensuring that this Open Government Plan will be implemented, but more importantly, I am committed to listening to you and ensuring that it serves as a catalyst to spur even more significant innovations in how we measure and achieve our strategic goals and objectives.

Sincerely,

Secretary Shaun Donovan

Executive Summary

The President's Open Government Initiative represents a major change in the way Federal Agencies interact with the public. HUD recognizes that open government is about more than new technologies and programs—it is about leveraging new ideas to improve the way the Department serves its customers. Whether through the creation of unique partnerships with other Agencies or the timely dissemination of HUD's data, the Department has identified ways to utilize the principles of transparency, engagement, and collaboration to increase mission efficiency and efficacy.

HUD's Bureaucracy Busting Flagship Initiatives

1. Establish an Innovation Lab to Fuel Program and Support Area Performance Improvements
2. Proactively Allocate Homelessness Prevention Resources Utilizing Predictive Analytics
3. Build a Business Practices Exchange for Housing Providers to Share Ideas
4. Identify and Update Outdated Policies and Practices

HUD has created a comprehensive plan that takes into account the specific culture, policy, and technology issues that need to be addressed in order to leverage open government to serve HUD missions. This plan describes the approach and key initiatives through which the Department will utilize open government to more effectively implement HUD's strategic plan. Through open government, HUD seeks to:

Increase Transparency by:
- Making HUD's processes, activities, and regulations more open, accessible, and transparent both internally and to HUD's many stakeholders
- Improving access to and the timeliness of HUD's financial and mission-related information by proactively making data available online in consistent, open formats, while protecting privacy, security, and confidentiality

Encourage Engagement by:
- Creating public online forums to solicit feedback from HUD's customers and guide that feedback into actions that improve mission performance
- Providing the public with the online ability to review and provide feedback on proposed rule changes before they are implemented

Drive collaboration by:
- Creating an exchange where mission related organizations, HUD stakeholders, HUD personnel, and state and local officials can openly share and discuss ideas and best practices and provide feedback on what works and what needs improvement
- Providing community-based non-profits access to tools and guidance to aid their establishment, sustainability, and effectiveness as force multipliers in their communities
- Continuing to develop HUD's collaborative relationships with other Federal agencies to more effectively implement HUD's strategic plan

These efforts will enhance HUD's ability to achieve its strategic goals by utilizing open government as a tool to this end. The Department's strategic goals are to:

1. Strengthen the Nation's housing market to bolster the economy and protect consumers
2. Meet the need for quality affordable rental homes

3. Utilize housing as a platform for improving quality of life
4. Build inclusive and sustainable communities free from discrimination
5. Transform the way HUD does business

The following pages provide an overview of HUD and its mission (**Chapter 1**), the approach the Department took to determine how open government could most effectively assist HUD's strategic goals (**Chapter 2**), HUD's bureaucracy busting flagship initiatives (**Chapter 3**), transparency initiatives, (**Chapter 4**), engagement initiatives (**Chapter 5**), collaboration initiatives (**Chapter 6**), and the challenges to utilizing open government (**Chapter 7**).

HUD's flagship open government capstone concept is *bureaucracy busting*. Bureaucracy busting is about fundamentally changing the way that HUD does business, and making the Department more efficient, proactive, flexible, and communicative. This plan includes multiple bureaucracy busting flagship initiatives that are all new and innovative, and that will enable the Department to reduce the number of unnecessary, time-consuming, and redundant processes, and to streamline interactions with HUD's stakeholders. These initiatives will receive priority support and resources as necessary.

Since the Open Government Plan is a living document, the list of flagship initiatives in this document is by no means final. As HUD continues to adapt and innovate, old initiatives may be modified and new initiatives may be added. The following table provides a high level description of the Department's bureaucracy busting flagship initiatives, each of which is further detailed in Chapter 3 of this plan.

Table 1 – HUD's Flagship Initiatives

Number	Flagship Initiatives	Description
FS-1	Establish an Innovation Lab to Fuel Program and Support Area Performance Improvements	Establish an innovation lab to incubate novel and unique ideas and tools that enhance HUD's mission performance. Leverage the innovation lab to break through bureaucracy barriers to quickly turn ideas into improvements.
FS-2	Empower Communities to Combat Homelessness Utilizing Predictive Analytics	Utilize data assets from throughout the Federal government in order to build predictive models and map based visualizations of communities that are trending towards increased levels of homelessness. Data can be leveraged from HUD, Commerce, Labor, Health and Human Services, and others in order to gain insight into communities that are at risk of increased homelessness. This data will be shared with the public in map form as well as raw data form via Data.gov.
FS-3	Build a Business Practices Exchange for Assisted Housing Providers to Share Ideas	Create an online capability through which assisted housing providers can share and discuss successful programs and ideas for service delivery.
FS-4	Identify and Update Outdated Policies and Practices	Collaborate with HUD's customers and stakeholders to identify and update business policies and practices within HUD.

Each of these flagship initiatives has been selected due to their support of multiple elements of the HUD Strategic Plan. The following table provides a snapshot of which of HUD's strategic goals are supported by each of the flagship initiatives in this Open Government Plan.

Table 2 – HUD's Flagship Initiatives Mapped to HUD's Strategic Goals

Number	Flagship Initiatives	Goal 1	Goal 2	Goal 3	Goal 4	Goal 5
FS-1	Establish an Innovation Lab to Fuel Program and Support Area Performance Improvements	X	X	X	X	X
FS-2	Empower Communities to Combat Homelessness Utilizing Predictive Analytics	X	X	X	X	X
FS-3	Build a Business Practices Exchange for Assisted Housing Providers to Share Ideas	X	X	X	X	X
FS-4	Identify and Update Outdated Policies and Practices	X	X	X	X	X

Transparency initiatives are projects that will help HUD publish its information online in useful formats and in contexts that help the public. The following table provides a high level description of HUD's transparency initiatives, each of which is further detailed in Chapter 4 of this plan.

Table 3 – HUD's Transparency Initiatives

Number	Transparency Initiatives	Description
T-1	Ensure HUD Regulations Are More Easily Available and Usable Online	Provide HUD's rules and regulations in a centralized, machine-readable, online format that is easy to use, share, search, and download.
T-2	Publish HUD-Assisted Housing Locations and Related Information	Make HUD-assisted housing location data available online in a centralized, machine-readable, online format that is easy to use. Make the data available as a service so that other websites can leverage the data for maps and other uses.
T-3	Make Housing Related Laws More Accessible to the Public	Put decisions online in a centralized, machine-readable, online format that is easy to use, share, search, and download.
T-4	Utilize Web 2.0 and Social Media Tools to Inform and Educate the Public and HUD Personnel	Utilize Web 2.0 and social media tools such as YouTube to create media informing the public about HUD's services and how these services can be leveraged. Also leverage these capabilities to provide training internal to HUD.
T-5	Create an Enterprise Wide Data Inventory and Storage Service	Create a list of the data that HUD maintains and capture standard metadata so that it can be shared as appropriate. Proactively plan to phase in additional sharing of data through initiatives like Data.gov.
T-6	Create an Online Directory of Major Points of Contact within HUD	Create a directory that will enable the public to more easily find and contact HUD offices and personnel. Ensure that the directory is usable in a variety of formats.
T-7	Create Foreign Language Resources at HUD's Field and Headquarters Offices	Create foreign language capabilities to better serve HUD's non-English speaking customers.
T-8	Participation in Federal Transparency Initiatives	Continue to utilize tools such as Data.gov to proactively share information with the public.

Each of these transparency initiatives has been selected due to their support of multiple elements of the HUD Strategic Plan. The following table provides a snapshot of which of HUD's strategic goals are supported by each of the transparency initiatives in this Open Government Plan.

Table 4 – HUD's Transparency Initiatives Mapped to HUD's Strategic Goals

Number	Transparency Initiatives	Goal 1	Goal 2	Goal 3	Goal 4	Goal 5
T-1	Ensure HUD Regulations Are More Easily Available and Usable Online		X	X	X	X
T-2	Publish HUD-Assisted Housing Locations and Related Information	X	X	X	X	X
T-3	Make Housing Related Laws More Accessible to the Public				X	X
T-4	Utilize Web 2.0 and Social Media Tools to Inform and Educate the Public and HUD Personnel	X				X
T-5	Create an Enterprise Wide Data Inventory and Storage Service	X		X		X
T-6	Create an Online Directory of Major Points of Contact within HUD					X
T-7	Create Foreign Language Resources at HUD's Field and Headquarters Offices		X	X	X	X
T-8	Participation in Federal Transparency Initiatives		X		X	X

Engagement initiatives are projects that will create opportunities for the public to participate throughout HUD's decision-making processes. The following table provides a high level description of HUD's engagement initiatives, each of which is further detailed in Chapter 5 of this plan.

Table 5 – HUD's Engagement Initiatives

Number	Engagement Initiatives	Description
E-1	Provide Improved Online Feedback Capabilities for Customers	Allow the public to provide feedback through a variety of channels, aggregate and track the feedback, and provide responsive actions based on it.
E-2	Provide Online Capabilities for Public Review of HUD Regulations Prior to Implementation	Provide mechanisms through a variety of channels so that the public can review and provide comment on regulations prior to their implementation.
E-3	HUD Ideas in Action: A Strategic Planning and Open Government Tool	Provide the public with ways to provide innovative ideas and ensure that HUD enables these ideas to improve the Department's services.
E-4	Transforming Rental Assistance	Create a unified and standardized process for managing HUD's relationship with rental assistance programs and provide better customer service to its customers.

Each of these engagement initiatives has been selected due to their support of multiple elements within the HUD Strategic Plan. The following table provides a snapshot of which of HUD's strategic goals are supported by each of the engagement initiatives in this Open Government Plan.

Table 6 – HUD's Engagement Initiatives Mapped to HUD's Strategic Goals

Number	Engagement Initiatives	Goal 1	Goal 2	Goal 3	Goal 4	Goal 5
E-1	Provide Improved Online Feedback Capabilities for Customers		X	X	X	X
E-2	Provide Online Capabilities for Public Review of HUD Regulations Prior to Implementation		X			X
E-3	HUD Ideas in Action: A Strategic Planning and Open Government Tool			X		X
E-4	Transforming Rental Assistance	X	X	X	X	X

Collaboration initiatives are projects that will help HUD revise its current practices to further cooperation with other Federal and non-Federal government Agencies, the public, and non-profit and private entities in fulfilling the Department's core mission activities. The following table provides a high level description of HUD's collaboration initiatives, each of which is further detailed in Chapter 6 of this plan.

Table 7 – HUD's Collaboration Initiatives

Number	Collaboration Initiatives	Description
C-1	Provide Tools to Community-Based Non-Profits to Act as Force Multipliers	Provide community-based non-profits access to tools and guidance to aid their establishment, sustainability, and effectiveness as force multipliers in their communities.
C-2	Utilize the Department of Energy's Weatherization Assistance Program as a Catalyst for Additional Collaboration to Aid HUD's Customers	Expand existing efforts to help residents of HUD-assisted housing weatherproof their homes. Increase collaborations with Department of Energy so that information is more readily available via online channels that are appropriate for HUD's customers.
C-3	Continue Collaboration with the Federal Communications Commission on Broadband	Build on efforts to help residents of HUD-assisted housing obtain broadband internet access to enhance the nation's economic base.
C-4	Continue Transportation Related Collaboration with the DOT and EPA	Continue to strengthen HUD's partnerships with the DOT and EPA to focus on transportation planning and sustainable growth.
C-5	Continue General Communication with the Public	Continue HUD's public facing engagement activities associated with its Office of Public Affairs.

Each of these collaboration initiatives has been selected due to their support of multiple elements of the HUD Strategic Plan. The following table provides a snapshot of which of HUD's strategic goals are supported by each of the collaboration initiatives in this Open Government Plan.

Table 8 – HUD's Collaboration Initiatives Mapped to HUD's Strategic Goals

Number	Collaboration Initiatives	Goal 1	Goal 2	Goal 3	Goal 4	Goal 5
C-1	Provide Tools to Community-Based Non-Profits to Act as Force Multipliers	X	X	X	X	X

Number	Collaboration Initiatives	Goal 1	Goal 2	Goal 3	Goal 4	Goal 5
C-2	Utilize the Department of Energy's Weatherization Assistance Program as a Catalyst for Additional Collaboration to Aid HUD's Customers	X	X	X		X
C-3	Continue Collaboration with the Federal Communications Commission on Broadband	X	X	X		X
C-4	Continue Transportation Related Collaboration with the DOT and EPA	X				X
C-5	Continue General Communication with the Public		X	X		X

This Open Government Plan is a living document. As HUD increases transparency, engagement, and collaboration, this plan will be refined and expanded with new ideas and initiatives.

1   Introduction to HUD

HUD and its roughly 9,600 employees occupy a leadership role in increasing homeownership, supporting community development, and increasing access to affordable housing that is free from discrimination.

The President's fiscal year 2011 budget request for HUD totals $41.6 billion.   The budget request supports HUD's five main strategic goals, which are to:

1. Strengthen the Nation's housing market to bolster the economy and protect consumers,
2. Meet the need for quality affordable rental homes,
3. Utilize housing as a platform for improving quality of life,
4. Build inclusive and sustainable communities free from discrimination, and
5. Transform the way HUD does business.

Since its first day of operation in 1965, HUD's programs have evolved to meet the changing needs of the nation. Today, the Department comprises the following major program areas:

Office of Community Planning and Development - The Office of Community Planning and Development (CPD) seeks to develop viable communities by promoting integrated approaches that provide decent housing, a suitable living environment, and expanded economic opportunities for low and moderate income persons. To accomplish these goals, CPD develops partnerships among all levels of government and the private sector, including for-profit and non-profit organizations.

Office of Fair Housing and Equal Opportunity – The Office of Fair Housing and Equal Opportunity (FHEO) administers Federal laws and establishes national policies that make sure all Americans have equal access to the housing of their choice. FHEO does this by implementing and enforcing civil rights laws, including Title VI of the Civil Rights Act of 1964, and by proactively working with private industry, fair-housing, and community advocates.

Office of Field Policy and Management - The Office of Field Policy and Management (FPM) provides direction and oversight for HUD's Regional and Field Office Directors, where the majority of HUD's employees are located. It communicates the priorities and policies of the Secretary to these managers, and ensures the effective pursuit of the Department's broader initiatives. In addition, FPM ensures that program impacts and customer service at the local level are assessed, and also provides operational feedback to HUD's central leadership.

Ginnie Mae - Ginnie Mae provides guarantees on mortgage-backed securities backed by federally insured or guaranteed loans, mainly loans issued by the Federal Housing Administration, the Department of Veterans Affairs, the Department of Agriculture's Rural Housing Service, and HUD's Office of Public and Indian Housing. Ginnie Mae securities are the only mortgage-backed securities that are guaranteed by the United States government, and it plays a vital role in channeling capital into the nation's housing markets.

Office of Healthy Homes and Lead Hazard Control - The Office of Healthy Homes and Lead Hazard Control (OHHLHC) works to eliminate childhood lead poisoning caused by lead-based paint hazards in older housing and to address other housing-related health and safety risks. The OHHLHC provides funding to state and local governments to control lead-based paint hazards in older housing, and grants to state and local governments, universities, and private-sector entities to protect children and their

families from health and safety hazards in the home. In addition, the office provides public outreach and technical assistance, and conducts technical studies to develop and assess cost-effective ways of reducing residential health and safety problems.

Office of Housing - The Office of Housing provides vital public services through its nationally administered programs and the control it exerts over the housing industry. One of the office's primary responsibilities is overseeing the Federal Housing Administration (FHA), the largest mortgage insurer in the world. The office also provides mortgage insurance to facilitate the construction of single and multifamily housing.

Office of Policy Development and Research– PD&R's primary function is to support HUD's mission and the policy agenda of the Secretary. PD&R performs policy analysis, research, surveys, and evaluations to help important stakeholders make informed decisions on about the Department's policies, programs, and proposals. PD&R also provides data support for HUD's ongoing operations, and builds partnerships with universities and other private institutions.

Office of Public and Indian Housing - The role of the Office of Public and Indian Housing is to ensure safe, decent, and affordable housing, create opportunities for residents' self-sufficiency and economic independence, and assure fiscal integrity by all program participants. PIH also strives to improve Public Housing Authority management, and the service delivery efforts of Indian housing authorities and tribally designated housing entities, through oversight, assistance, and selective intervention by dedicated field personnel.

Office of Sustainable Housing and Communities - The mission of the Office of Sustainable Housing and Communities is to create sustainable communities by connecting housing to jobs, fostering local innovation, and helping to build a more energy efficient economy. The office continues to coordinate Federal housing and transportation investments in order to reduce transportation costs, improve housing affordability, and increase access to employment opportunities. In addition, the office works with Federal Agencies, states, local communities, and industry partners to catalyze innovation and reduce energy consumption in the residential sector.

2 Strengthening Open Government at HUD

HUD's Open Government Plan is a roadmap that describes how the Department will utilize open government as one of its many tools to enable the implementation of its strategic plan. This Open Government Plan reflects the input of HUD's senior policy, legal, and technology leadership, as well as the general public.

2.1 Aligning Open Government with HUD's Strategic Goals

At the core of HUD's Open Government Plan is the alignment of open government activities to HUD's strategic goals. The Department realizes that in order to fully achieve performance improvements from open government efforts and maintain sustained commitment to increasing transparency, engagement, and collaboration, open government objectives need to align with HUD's strategic goals.

Within HUD's program areas, there have been innovations in transparency, engagement, and collaboration that have helped with mission delivery. Some of these existing and ongoing initiatives are documented in Chapters 4, 5, and 6 of this plan. Although strides have been made, there are always new innovations to apply to mission delivery.

During the development of this plan, HUD worked with each of its mission areas to define a concept of open government that was applicable and relevant not only to HUD's strategic goals but also to HUD's customers. As described in the Executive Summary, the result is a series of open government initiatives that have been developed with the express intent of enabling the delivery of HUD's strategic plan.

2.2 HUD's Customers and Stakeholders

HUD's mission puts it in direct contact with a significant portion of the population. Its customers are a diverse group of individuals and families that all have unique needs, tastes, and preferences. Its partners and stakeholders include:

- Private non-profits
- Corporate partners
- Elected officials
- Community-based non-profits
- Housing providers
- Good governance groups

HUD Facts:
• HUD employs 9,664 staff, 6,477 of whom are located in its field offices
• The Federal Housing Administration (FHA) has helped refinance 800,000 homeowners into stable, affordable, fixed-rate mortgages
• Over 9 million people live in Federally assisted housing - Around 4.5 million are children - Around 1 million are seniors

This Open Government Plan was developed not only for HUD's direct stakeholders, but also for an extended collection of stakeholders that include academic researchers, private businesses, and citizens that may not currently utilize HUD's services. The Department recognizes that each group has its own needs for transparency, engagement, and collaboration.

## 2.3 Open Government Value Proposition

The primary goal of HUD's Open Government Plan is to leverage open government to improve mission delivery. One of the primary values of open government is properly utilizing the vast ingenuity and creativity of the public to generate ideas that can help government function more efficiently. The public, given the right tools, can help the government identify the most pressing areas for transformation and the solutions for them. Challenges including homelessness, fair housing, rental assistance, and community planning can be more effectively overcome by tapping into the talent and energies of the public.

By introducing open government initiatives that tie directly to HUD's strategic plan, HUD can (1) enhance mission performance and results through the identification of inefficient activities or processes; (2) leverage the public's knowledge and experience to identify new innovations or opportunities; and (3) create a stronger relationship between HUD and the American public.

Figure 1 - Benefits of Open Government to HUD
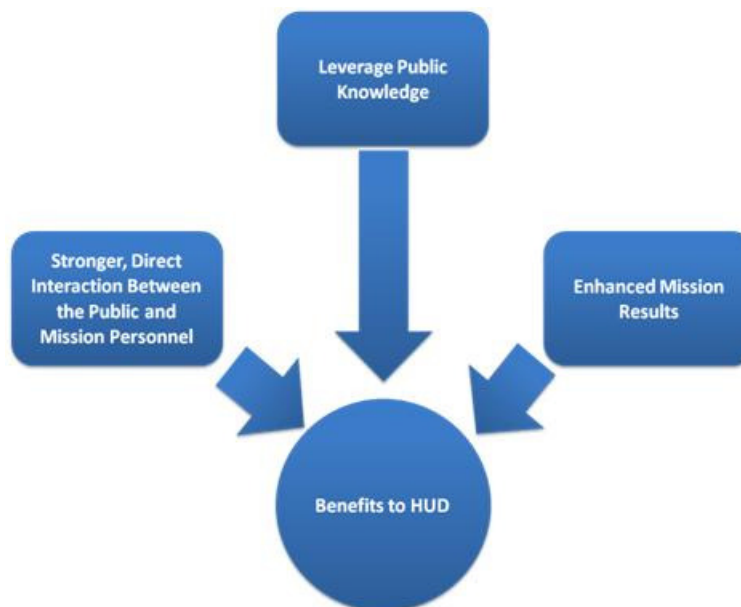
HUD will develop a robust performance measurement methodology that properly captures the monetary and non-monetary benefits that it will receive from its open government activities. This will include the use of a balanced scorecard to capture benefits and performance, and to identify areas that may need further improvement. Some key performance indicators may include items like:

- The number of projects or programs that have considered the public's feedback to address mission performance
- Effects of these comments on mission performance
- The number of comments received and adjudicated (as a percentage)

This is by no means an exhaustive list, and HUD will continuously engage with its program areas in further detail to identify relevant performance metrics that may be unique to each area.
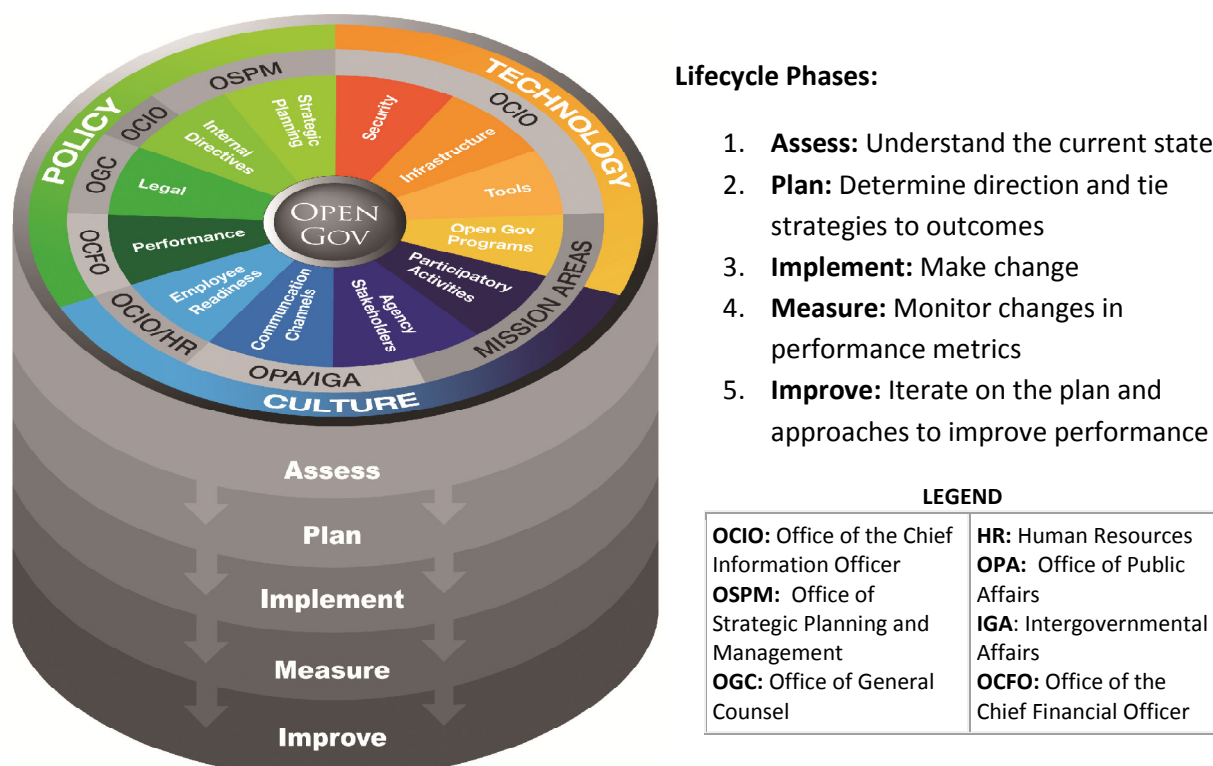
2.4 Open Government Methodology

HUD's Open Government Plan development followed a comprehensive methodology that looked holistically at its current policy, cultural, and technology environments. This will enable HUD's open government activities to be frequently revised to adapt to changing operating environments.

2.4.1 HUD's Open Government Framework & Significant Stakeholders

HUD has adopted a comprehensive lifecycle management approach to help identify and plan for its open government initiatives. HUD's open government framework, shown below in Figure 2, includes the program lifecycle phases, crucial areas of assessment, and the key players involved in the planning and executing of HUD's open government efforts.

Figure 2: HUD's Open Government Framework

Lifecycle Phases:

1. **Assess:** Understand the current state
2. **Plan:** Determine direction and tie strategies to outcomes
3. **Implement:** Make change
4. **Measure:** Monitor changes in performance metrics
5. **Improve:** Iterate on the plan and approaches to improve performance

LEGEND

OCIO: Office of the Chief Information Officer	**HR:** Human Resources
OSPM: Office of Strategic Planning and Management	**OPA:** Office of Public Affairs
	IGA: Intergovernmental Affairs
OGC: Office of General Counsel	**OCFO:** Office of the Chief Financial Officer

The lifecycle phases each include activities that span many if not all of HUD's organizations. The grey ring in Figure 3 illustrates the HUD organizations that own portions of the policy, technology, and culture components of the open government discipline. Open government at HUD is dependent on these organizations actively contributing to the planning and management of HUD's open government initiatives.

Figure 3: Mission and Support Area Involvement with Open Government Activities

In phase 1 (**Assess**), HUD assessed its operational environments and determined the most appropriate ways that open government can be leveraged. HUD's governance structure, outlined in section 2.5.1, will provide the leadership and oversight to ensure that the Department is properly assessing its current operational environments and aligning open government with its strategic plan.

In phases 2 and 3 (**Plan** and **Implement**) HUD will fully plan and prioritize the piloting and implementation of its open government initiatives. Phases 4 and 5 (**Measure** and **Improve**) will be a continuous process that will seek to measure the benefits HUD is receiving from its open government initiatives. The Department will retire or modify an initiative or solution if its utility decreases below a threshold set by HUD's open government leadership group.

2.4.2 Solicitation of Public Comment

During the development of the Open Government Plan, HUD also provided opportunities for the public to provide ideas for improving HUD operations in the areas of transparency, participation, collaboration, and innovation. HUD used its IdeaScale website (https://openhud.ideascale.com) and its HUD Ideas in Action (http://hudideasinaction.uservoice.com) website to solicit public ideas.

HUD's IdeaScale site was created specifically for the purpose of informing its Open Government Plan, while the Ideas in Action site was created to inform its strategic plan. Many of the comments and ideas on the Ideas in Action site, however, are relevant to open government. Section 5.3 details how these

comments were utilized, and how this site will continue to contribute to HUD's open government activities in the future.

2.5   Cultural Change

Cultural Change Case Study:

The ability to identify repetitive, inefficient processes and solutions is a key organizational tool within HUD. Developing social media forums like an internal HUD IdeaScale page to identify and target outdated practices will:

1) Expose inefficiencies in a timely manner
2) Validate potential solutions through peer review.

HUD, like many organizations, will need targeted internal training and consistent communications to help promote a culture of innovation, transparency, and openness. To facilitate this cultural change, HUD will leverage a leadership and governance structure and a communications plan with measureable results. This will help enable the Department to move to a more open environment where transparency, engagement, and collaboration are a vital part of everyday operations.

2.5.1   Leadership and Governance

As illustrated below, open government at HUD is governed by a dedicated leadership and governance structure.

Figure 4 – HUD's Open Government Governance Structure
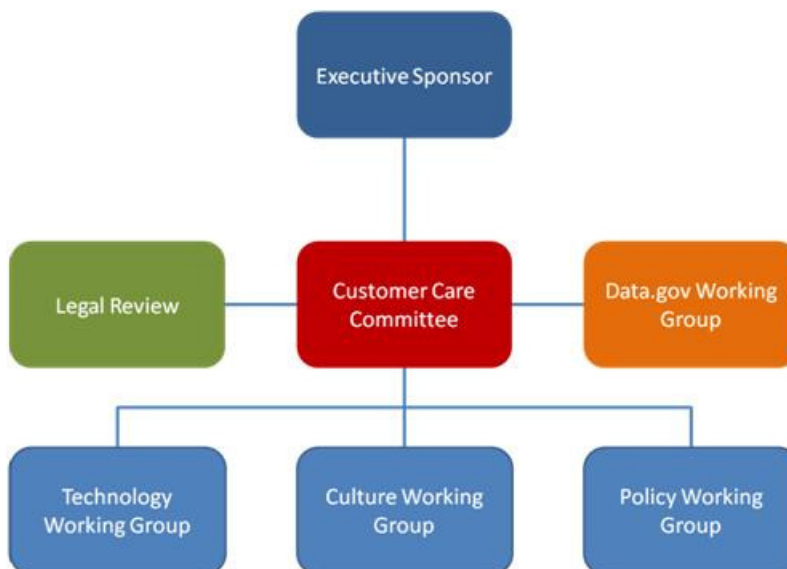
HUD's governance structure consists of three working groups that work with the Customer Care Committee, one of HUD's governance bodies, to make the appropriate decisions about where to invest time and resources for open government activities. The Customer Care Committee's membership consists of senior executives who have detailed knowledge of HUD's strategic activities and processes, enabling them to make informed open government investment decisions.

The Data.gov working group and the Office of General Counsel provide support as necessary to the Customer Care Committee and its members. Lastly, HUD's open government Executive Sponsor, the

Chief Operating Officer, provides the necessary leadership, oversight, direction, and vision to ensure open government is achievable, sustainable, and aligned with the Department's strategic plan.

2.5.2   Communications Plan

As a part of the open government planning process, HUD will develop an internal and external communications plan that will provide a framework for coordinating all communications that take place as part of HUD's open government planning and implementation activities. It is intended to be a living document that guides the Department in developing and implementing communications initiatives and products to provide stakeholders with accurate and timely information about HUD's open government activities.

HUD Facts:

- Provides over $1.4 billion in homeless assistance funding to 6,445 programs
- $738 million to provide permanent housing solutions to the homeless
- Coordinates and interacts with over 3,200 public housing authorities

The extent of the administration's commitment to open government will be new for some civil service employees and needs to be integrated into the workplace. It will therefore require deliberate actions geared towards cultural change in HUD. In essence two different communication campaigns are needed; one internally for HUD employees, and one to ensure the public is aware of the implementation and can participate in the development of open government.

Therefore the first focus will be on internal communications built around simple and cost effective strategies to internalize the idea of transparency, engagement, and collaboration. The goal of the plan is to help employees see themselves as agents of change and not just people affected by change.

The key objectives of the Internal Open Government Communications Plan are:

- To raise internal awareness of the Open Government initiative and its implementation
- To build internal support for the implementation of the Open Government Program
- To create a culture of openness at HUD

Core values to be communicated are a sense of service to the public and the importance to democracy and professional excellence of disclosing information. This can be done by using the following messages in training sessions and other points of contact:

- Public servants are stewards of government information on behalf of the taxpayers
- Providing information to the people is an integral part of the role of civil service
- Public servants create records of the government, most of which, barring privacy concerns could be made available to the people
- HUD's employees are citizens too, and it is in their interest to promote and embrace these changes

Strategies for this plan include:

- Town hall meetings hosted by HUD leadership to discuss open government
- HUD-wide email distributions
- Publicize milestones

- Internal webcast explaining responsibility/accountability
- Workshops with Field Policy Management leadership
- A quarterly Open Government Newsletter
- Using HUD's intranet to keep people informed
- Providing a comprehensive HUD web index

A second external communications plan will also be developed. This plan will be geared towards the public – informing and educating them on the scope of open government.

For the public it will be important to:

- Explain the principles of open government
- Create awareness of the value of open government
- Educate the public on how to access the information they want

Strategies:

- Incorporating Open Government messaging into HUD speeches by senior leadership
- Publicizing Open Government website via social media including blogs, You Tube, Twitter and Facebook and encouraging feedback
- Posting Open Government URL on all Department websites
- Using earned media events to get the message out

The Open Government Communications Plan will help drive an internal cultural shift and devise an educational and media campaign to promote the new information HUD will be proactively providing to its stakeholders. It will also provide HUD's employees with the information and strategies for effective communication about open and transparent government.

2.6   HUD's Public Feedback Mechanisms

Public feedback is a vital part of open government. As one of its open government initiatives, HUD will utilize public feedback mechanisms that will allow the public, stakeholders, and HUD's customers to give direct feedback to mission owners and personnel. HUD will utilize a variety of tools including email, its website, and social media. The diagram below illustrates the feedback review process in more detail:

Figure 5 – HUD's Potential Open Government Comment Adjudication Process
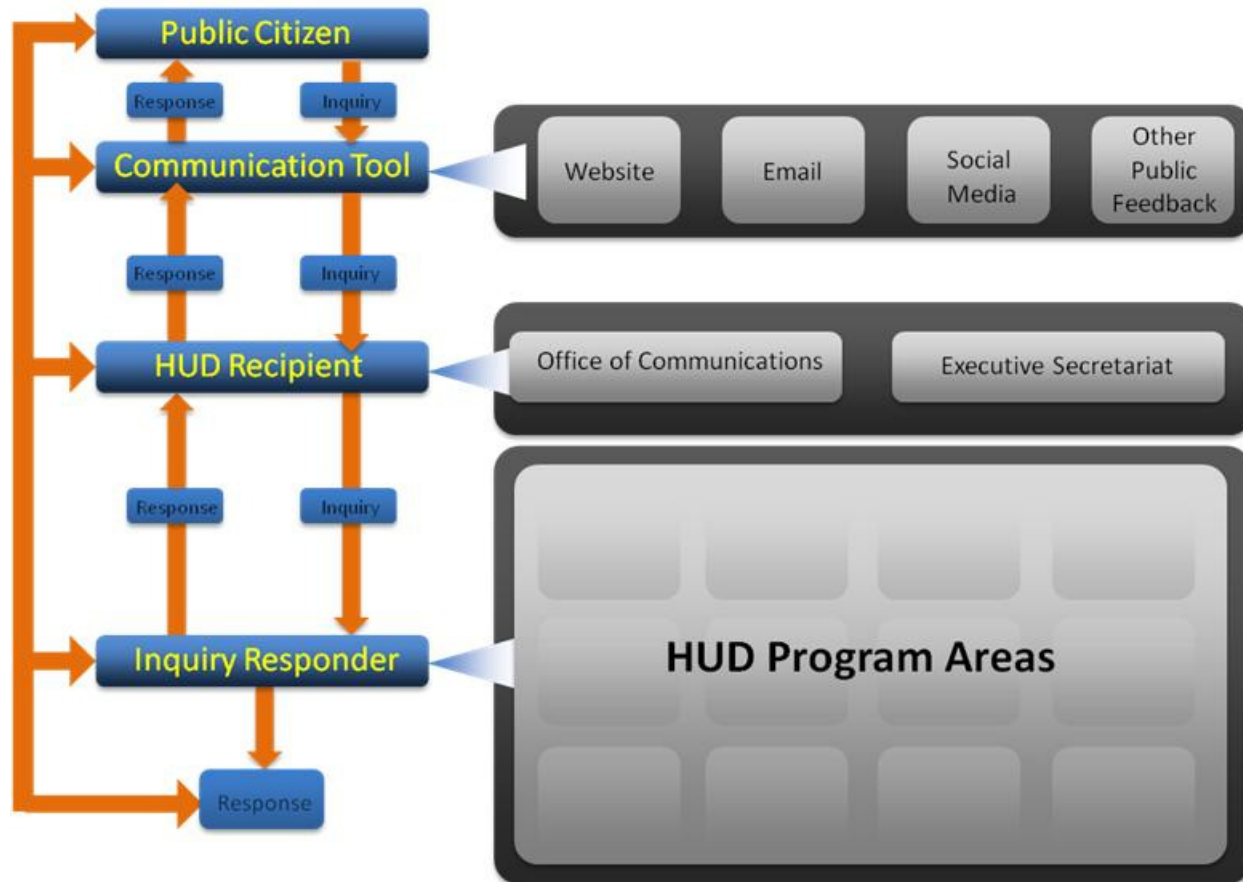
HUD will make every effort to direct substantive public comments and feedback to the appropriate personnel, including the Office of Public Affairs and the communications offices attached to the Department's various program areas. In cases where a personalized response is necessary, HUD will ensure that it complies with Federal and Departmental communications procedures. HUD is committed to active and effective public communication, and aims to achieve a maximum response time of 6 working weeks from the submission of a comment to its successful adjudication.

3   Bureaucracy Busting Flagship Initiatives

HUD will undertake multiple flagship initiatives with the overarching theme of improving openness while reducing the number of unnecessary, time-consuming, and redundant processes that currently exist within the Department. These projects will reduce bureaucratic inefficiencies, foster more streamlined interaction with stakeholders, and improve the Department's ability to be open and responsive. The diagram below illustrates HUD's flagship initiatives:

Figure 6 – HUD's Flagship Initiatives
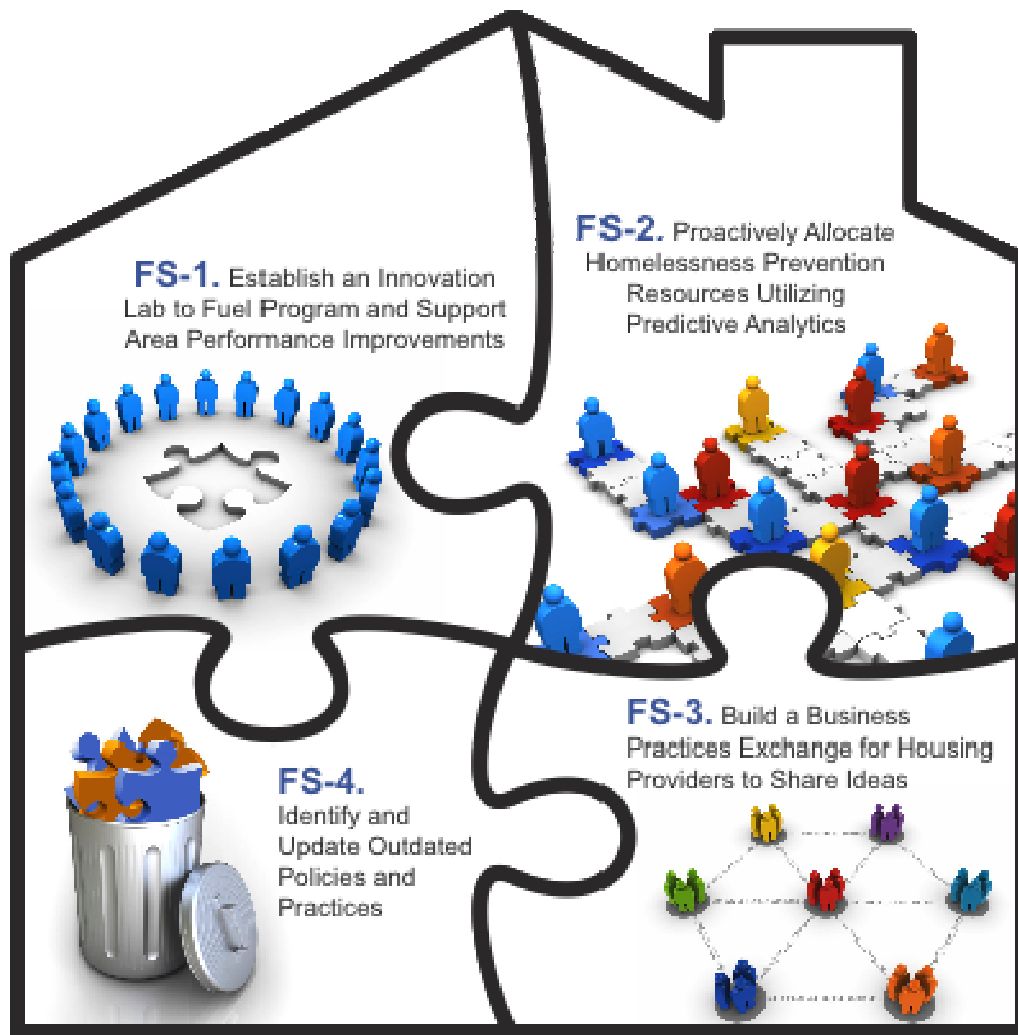
They will receive priority support and additional administrative resources in order to disseminate a culture of efficiency and responsiveness throughout HUD. Each of these projects aligns with the Department's broader strategic goals while also enhancing transparency, engagement, and collaboration with the public, other Agencies, and stakeholders.

3.1 Establish an Innovation Lab to Enhance Program and Support Area Performance

The establishment of an Innovation Lab can benefit HUD through the incubation of novel and unique ideas that improve its interactions with customers, increase mission efficiency and efficacy, and reduce duplication of effort.

The innovation lab could explore the possibility of utilizing geo-located texting services to inform its most vulnerable customers about critical services in emergency situations. For example, if a municipality with numerous HUD-assisted housing units was expected to experience flooding, the Department could, with the right technology, send out a timely warning to its customers and tell them where they could best receive assistance. Many of HUD's customers might lack easy access to the Internet, but many have cell phones with texting capabilities and this is a fruitful area for additional research.

Another possible project is the development of an iPhone, Android, Windows 7, or other mobile operating system application that allows HUD's stakeholders, partners, and customers to access relevant information about the locations of the Department's field offices, local housing providers, or other relevant information. Such an application would not only be useful in an office setting, but also in mobile situations, enabling housing providers and other personnel to go out in the field, engage with their customers, and provide on-the-spot resolution of questions. Innovation lab personnel will engage with the target market for such an application to determine what information would be most useful to them in both an office and mobile environment.

Setting up such a lab will require significant consultation with stakeholders, the development of an appropriate governance structure, modification of relevant policies, and the procurement of a dedicated source of funding. However, recognition of the lab's importance in producing and disseminating new methods that complement HUD's efforts in transparency, engagement, and collaboration should allow these obstacles to be overcome.

3.2 Empower Communities to Combat Homelessness Utilizing Predictive Analytics

Since 2001, HUD has worked with communities to implement and use local Homeless Management Information Systems (HMIS) to collect client-level data to discover the number and characteristics of homeless persons. Today, nearly every city and county in America operates HMIS. HUD reports national and local data on homelessness to Congress and the public through the Annual Homelessness Assessment Report (AHAR). Given the critical need for timely information in the current economic downturn, HUD is expanding the use of the HMIS System so it can serve as a platform to help communities more effectively confront homelessness. The recent passage of the HEARTH Act of 2009 aligns with this effort by consolidating and simplifying HUD's various homelessness resources.

The information from the HMIS helps determine whether homelessness is increasing or decreasing and what sub-populations are most affected. As a result of these efforts, community leaders and the public will know more about the nature and size of the challenge and be better able to target limited resources to maximize effectiveness. Under new programs such as the Homelessness Prevention and Rapid Re-Housing Program (HPRP), funded through the Recovery Act in 2009, communities will have resources to create meaningful local projects aimed at *preventing* homelessness and *rapidly re-housing* those who

are currently experiencing it. These programs align with HUD's strategic initiative of "Ending Homelessness by Preventing It."

Moreover, through HUD's Homelessness Resource Exchange (HRE) web site, field research, on-line surveys, and townhall meetings, HUD will seek input from community stakeholders and the public about how best to reduce and ultimately eliminate homelessness. Information received through these efforts will be used to identify best practices and outcomes of HPRP, and to assess the impact of other homelessness programs. HUD will make this data publically available, and it will engage its stakeholders in identifying its most useful attributes.

> **Causes of Homelessness are Varied and Will Be Combated by Acting on Inter-Agency Information and Analysis**
> - Job Losses
> - Mortgage Foreclosures
> - Excessive Medical Costs
> - Influx of Immigrants
> - Return of Soldiers After Active Duty
> - Shifting Industries

Building on all of these efforts, HUD will assume a proactive leadership role in the Administration's efforts to combat homelessness by endeavoring to develop a new and innovative set of tools and processes. The Department's effort is unique because it will seek to predict the future course of homelessness in a community, and it will allow HUD to proactively allocate homelessness resources. Similar to how the Department of the Interior tries to predict where wildfires will occur using relevant data on precipitation, wind, and temperature, HUD and its partners will try to predict which geographic areas are at risk of heightened levels of homelessness

HUD believes that research is needed to determine how combining information from multiple agencies could lead to the development of a predictive model that could help communities avert homelessness before it happens. The first phase of this effort is to collect data that could be used in a predictive model, and the second phase is to develop an interactive model and make it available to the public.

The illustration below displays a potential tool via an interactive map:

Figure 7 –Mapping Areas of Potentially High Homelessness

SAMPLE DATA

For illustrative purposes only.
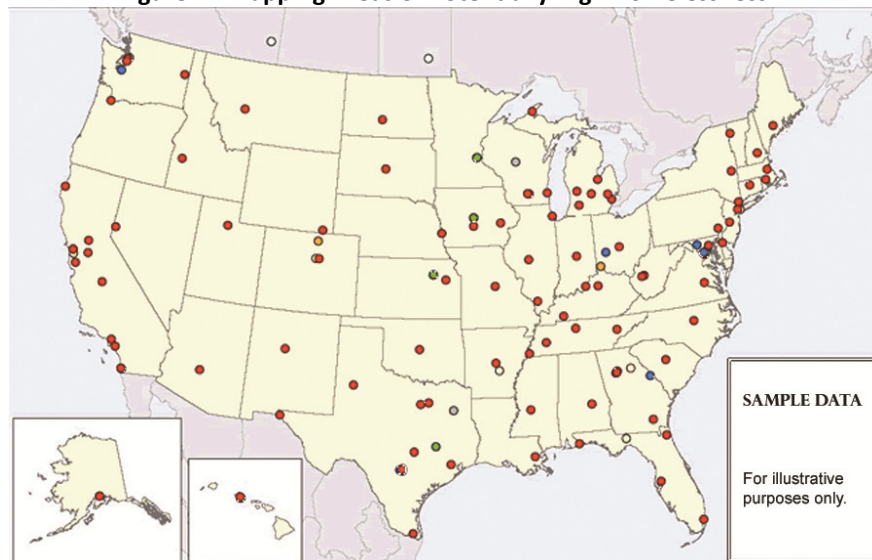
As part of this research effort, HUD will proactively explore partnerships with relevant non-profits, the US Census Bureau, Health and Human Services, the Departments of Labor, Commerce, and Defense, the Veterans Administration, and other agencies or groups to identify collaborative ways in which each organization can contribute to the fight against homelessness. Cooperation with financial regulatory agencies and other entities gathering relevant economic data may also provide HUD with valuable leading indicators of potential increases in homelessness. This cooperation will include data sharing agreements to identify information that can be shared among these groups to provide the best predictive capability in identifying areas for rapid increases in homelessness.

> **Homelessness Facts:**
>
> Nearly 1.6 million people use emergency or transitional planning every year

This proactive tool will not only address homelessness, but also yield substantial cost savings. The costs of sheltering families in transitional housing are substantially greater than those associated with programs such as the HPRP. Predicting when and where homelessness will strike will allow HUD and its local partners to use more affordable and sustainable long-term programs instead of short-term, expensive, and patchwork solutions.

3.3   Build a Business Practices Exchange for Assisted Housing Providers to Share Ideas

HUD not only wants to 'bust bureaucracy' within its own corridors, but also act as a catalyst for change among the various state, local, and tribal assisted housing providers that it cooperates with. The Department will create a best practices repository, where housing providers may upload programs they consider to be successful for review by other interested parties. Much as visitors to Amazon.com can vote on the usefulness and relevance of user-submitted reviews, viewers of the best practices stored in the repository will be able to vote on those that they find most helpful.

> *"When Washington lags a generation behind in how we do business, that has a real and serious impact on people's lives."*
>
> - President Obama

The repository will be a community in which housing provider personnel, their customers, and the general public can collaborate and communicate with each other without the direct involvement of HUD. The Department will also utilize this tool to help local housing providers, especially those with limited resources, find and utilize previously developed plans, which will allow them to focus on delivering value to their customers.

3.4   Identify and Update Outdated Policies and Practices

HUD will begin a comprehensive program dedicated to identifying and updating outdated policies, regulations, and practices that no longer bring mission value and that are needlessly hindering the Department's performance. These barriers to progress exist at the Federal, state, and local levels, and will require that HUD adopt a targeted and balanced effort to address them. Modifying outdated rules and regulations will not only increase HUD's efficiency, but also help in changing the Department's culture to one that is more proactive in identifying mission impediments and more flexible in serving its customers.

This may include the use of social media tools, such as Youtube, to post archived video recordings of all of HUD's public meetings or current processes.   This initiative is fully in keeping with HUD's strategic plan, and it will involve all functional areas within the Department. External stakeholders, public participants, and HUD's employees who adhere to outdated policies will aid in their identification. This will require HUD to engage with relevant stakeholder groups and publish its current policies, processes, and regulations for public comment in order to identify inefficient ones that can be updated.

HUD's current hiring process requires:
• 40 steps
• 19 signatures
It averages 139 days from start to finish, as documented by OMB's Deputy Director of Management, Jeffrey Zients.

3.5 Managing the Flagship Initiatives

As depicted in Figure 8, HUD will utilize standard project management practices, as developed by the Project Management Institute (PMI), in order to initiate, manage, and deploy HUD's flagship initiatives.

Figure 8 – HUD's Flagship Initiative Project Management Process
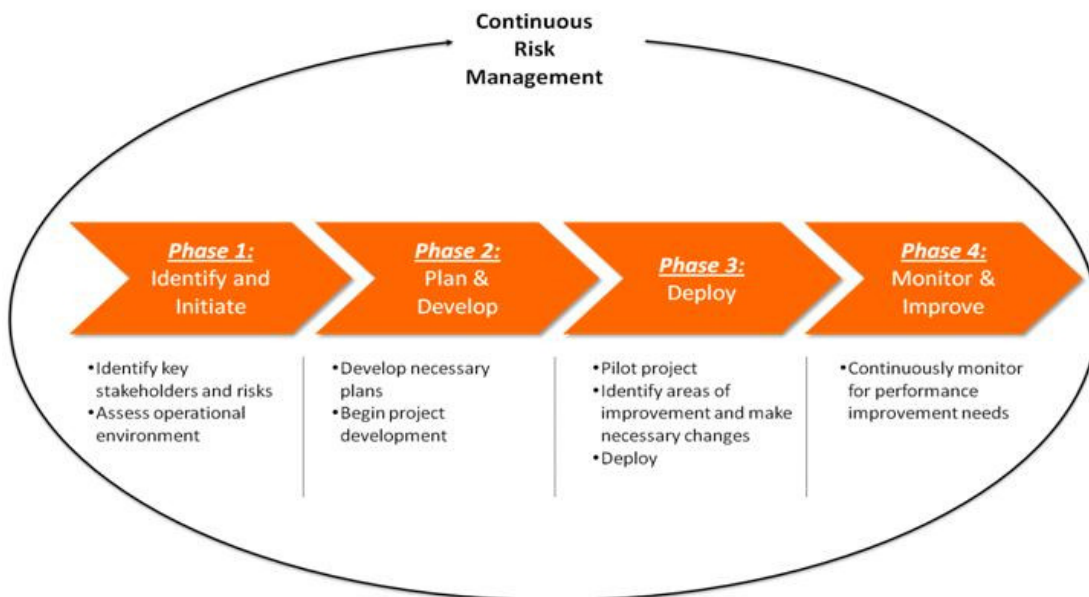
This framework provides a comprehensive, scalable, and repeatable set of guidelines that will standardize the way flagship initiatives are managed and deployed so the public interacts with a set of tools that have undergone similar quality control checks to ensure standardization and ease of use.

4   Transparency Initiatives

The Open Government Directive describes transparency as promoting "accountability by providing the public with information about what the government is doing." In order to achieve this goal, HUD will increase its efforts to publish information in open formats that can be utilized by a wide variety of users. The following sub-sections introduce transparency related projects HUD is currently or will be undertaking.   The Department already conducts some these activities, but there is room for improvement in making the relevant processes and data more open to the public.

4.1   Ensure HUD Regulations Are More Easily Available and Usable Online

One of HUD's major mission areas is the administration and enforcement of laws. For example, fair housing laws prohibit discrimination on the basis of race, color, religion, sex, national origin, disability, or family status. Relevant laws and statutes are relatively complicated and not always easily accessible.

HUD will publish its regulations in machine-readable formats for direct use by the public, HUD employees from other mission areas, other government personnel, and private-sector developers. This will increase the transparency of these regulations, and allow for their broader dissemination and understanding. Third parties, such as community-based not for profits, will be able to more quickly disseminate information to their constituents, and more easily inform citizens of their rights.

4.2   Publish HUD-Assisted Housing Locations and Related Information

HUD strives to ensure America's citizens have access to safe, decent, and affordable housing. The Department does this through the outright ownership of housing stock, and also through various subsidies and rental voucher programs.

Detailed information about HUD's housing portfolio, such as the availability of units and where they are located, has traditionally been inaccessible to the public. Gathering this information and putting it online in an easily navigable and machine readable format will allow for greater ease of use on the part of citizens requiring HUD's services. Moreover, it will enable researchers, developers, and other consumers of data outside of the Department to better utilize the information that is already being collected.

> **Open Government Initiatives Formulated from IdeaScale Comments:**
> - **T-1:** Ensure HUD Regulations are More Easily Available and Usable Online
> - **T-2:** Publish HUD-Assisted Housing Locations and Related Information
> - **T-3:** Make Housing Related Laws more Accessible to the Public
> - **E-1:** Provide Improved Online Feedback Capabilities for Customers
> - **E-2**: Provide Online Capabilities for Public Review of HUD Regulations Prior to Implementation

HUD is aware of the potentially sensitive nature of this information, and it will ensure that none of its customers' personally identifiable information (PII) is released during the implementation of this initiative. This will include limiting the level at which housing units are identified to the zip-code or congressional district level, thus limiting the ability of PII information being disclosed or discovered through mash-ups with other data.

Delivery mediums of the data released in accordance with this initiative will take into account its likely consumers. In particular, low-income members of the public might not always have easy access to the

Internet. The effective delivery of such information will require internal education of HUD employees, as well as clear communication with community-based non-profits that interact with these customers most frequently.

In addition to aiding citizens participating in HUD's numerous assisted housing programs, the greater flexibility, accountability, and transparency that will result from this program will also be of great assistance to the Department in monitoring the state of its assets and the use of its funds.

4.3   Make Housing Related Laws More Accessible to the Public

HUD's Office of Hearings and Appeals is an independent adjudicatory office within the Department whose administrative law judges conduct hearings and make determinations in accordance with existing statutes, regulations, and procedures. These administrative law judges have jurisdiction to hear and decide cases involving certain sections of the US Code, as well as cases involving interstate land sales, HUD sanctions, and community block grants. The Department's current website allows citizens to read substantive decisions issued by administrative law judges, but does not contain subsequent determinations that might have been made by either the HUD Secretary or a Federal court.

This means citizens cannot necessarily discover the final outcome of a case. Additionally, the available cases are organized in simple chronological and alphabetical order, which makes conducting effective searches difficult. Uploading these cases in an easily searchable, machine-readable format would improve both the access and transparency of such decisions.

HUD will utilize this initiative to publish housing related laws in one centralized site that is easily accessible. Similar to the Public Resource's notion of a law.gov site, or the Federal Communications Commission's calls for transparency in expanding broadband access, HUD's site will be a central location that its customers can use to view and comment on laws affecting their housing rights.

4.4   Utilize Web 2.0 and Social Media Tools to Inform and Educate the Public and HUD Personnel

Since HUD performs a diverse set of functions, citizens seeking its services must often procure different forms from several different program areas. The resulting process can be confusing and time-consuming.

In an effort to better serve the American people, the U.S. Department of Housing and Urban Development (HUD) has embraced social media and streamlined its Web site contact tools to facilitate open communication and total transparency.

As the new generation of information seekers primarily accesses news and other content through social networking sites like Facebook and Twitter, HUD deemed it essential that the Department get up to speed on today's popular channels of communication. After all, 50 percent of Facebook's 400 million users log on every day, according to Facebook. Furthermore, while only 21 percent of Twitter's 19 million users are active, that's still 3,990,000 people to reach, according to Mashable.com, a respected social media news blog.

HUD also created its own Youtube channel, which currently features Lead Free Kids, a collaborative effort with the Ad Council about lead-based paint, and a short informational video about fair housing.

Users access 2 billion videos a day on YouTube, according to the site.

Ultimately, the proof is in the numbers and in the preferences of the American people. So, stay connected with HUD via RSS (really simple syndication) Feeds, the HUD Facebook page, HUD Twitter, the HUD Youtube Channel, the HUD wiki and the recently launched HUD Mobile site.

RSS Feeds: http://www.hud.gov/rss/index.cfm
HUD Facebook page: http://www.facebook.com/HUD
HUD Twitter: http://twitter.com/HUDnews
HUD Youtube Channel: http://www.youtube.com/HUDchannel
HUD wiki: http://www.hud.gov/wiki
HUD Mobile: http://portal.hud.gov/portal/page/portal/HUDMobile

Numerous opportunities exist across the Department including innovative solutions that are not only directed at the public and customers, but internal HUD employees, as well. Field personnel have often stated the need for services that currently exist within HUD, but that they are simply unaware that they have access. Web 2.0 and social media delivery mediums will notify HUD field personnel of specific capabilities that can address their unique needs.

4.5   Create an Enterprise Wide Data Inventory and Storage Service

HUD currently manages over 52 programs that rely upon the collection and analysis of data. This data covers a broad range of information about housing inventory, customer demographics, performance of public housing authorities, and various other kinds of information. Some of this is stored in open formats and published on specific program areas' websites. HUD seeks to make this data more accessible by continuing its work to create an enterprise wide data inventory to properly log the location, purpose, and other relevant criteria of each data asset. This will include standardizing metadata, providing data context and usability guidance to consumers of the information, and distributing data through modern channels (including Data.gov).

The Department will also investigate the utility of an enterprise data storage service. Either through utilizing Data.gov's proposed Shared Data Storage Service or its own repository, HUD will identify data that exists within its program and support areas, aggregate it, store it in one centralized service, and then publish it on Data.gov, provided that the data in question is not sensitive in nature.

HUD's Office of the Chief Information Officer (OCIO) will conduct a feasibility study that compares Data.gov's Shared Data Storage Service, its own proprietary repository, and any other options that may support this initiative. Implementation of this initiative will be performed in a phased approach that will identify goals that can be realistically achieved in 6, 12, and 24 months.

4.6   Create an Online Directory of Major Points of Contact within HUD

Besides its call centers, HUD currently lacks an easily accessible online directory of its vital points of contact. The creation of such a directory will be a simple, quick, and low-cost way of making HUD more transparent and accountable to the public.

4.7 Create Foreign Language Resources at HUD's Field and Headquarters Offices

The Department recognizes that it needs to increase its capacity to provide services to non-English speakers. HUD will build on its previous achievements and create new phone and web-based services at its headquarters, regional field offices, and call centers that are specifically tailored to citizens from different cultural and linguistic backgrounds. The primary emphasis of this initiative will be on making HUD's field offices more receptive and open to speakers of foreign languages, and the Department will strive to be as flexible as possible in allocating resources based on the backgrounds of customers in each field office's geographic area.

4.8 Participation in Federal Transparency Initiatives

4.8.1.1 Data.gov, Recovery.gov, USASpending.gov, and OMB's IT Dashboard

An important part of the Administration's Open Government initiative, Data.gov increases the ability of the public to find, understand, and utilize information that is owned by the Federal Government. HUD has provided 5 datasets and 8 tools to Data.Gov that cover a wide range of topics. HUD's datasets and tools comprise everything from physical inspection scores and housing surveys to public housing rent estimates. HUD has followed a standard process for identifying and publishing datasets:

Figure 9 – HUD's Data.gov Submission Process
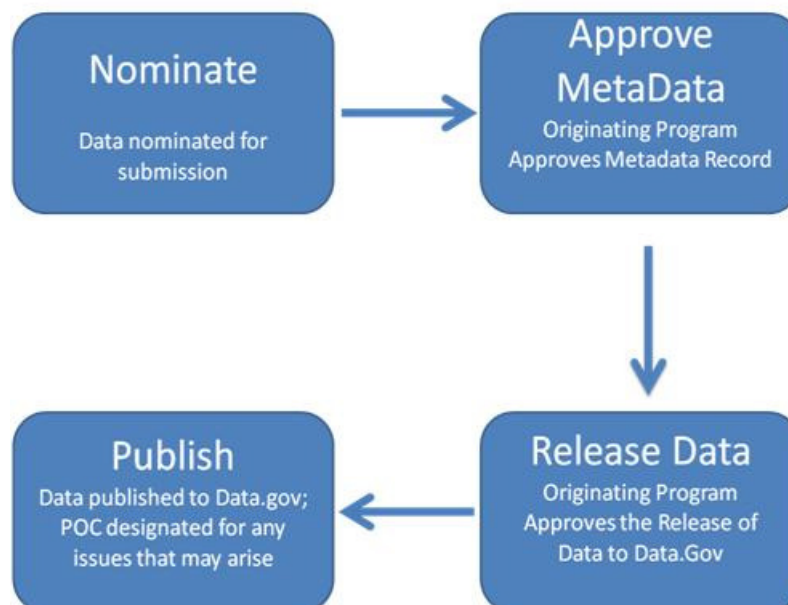
As previously stated, there are over 52 programs within HUD that collect and utilize data to fulfill their missions. The public's ability to discover the data that is published online is hampered by the lack of standardization around each program area's site navigation. These published datasets include such things as fair housing rents, public housing authority performance reviews, and a multitude of other things. The majority of the data that HUD collects, however, is not published online. HUD will utilize Data.gov to continue the publication of its data, and use it as a central repository to enable the public to easily discover and utilize the data that HUD already collects.

HUD's efforts to publish its data will be dependent upon the completion of its data inventory. As HUD identifies data within each program area, it will immediately begin the publication and review process to upload the data to Data.gov, or make necessary modifications to make the data publishable. The Department is already in the process of conducting these activities as it has data already nominated 11 more datasets for submission. The Department is committed to publishing additional high-value datasets monthly.

Due to the nature of its mission, HUD is an important stakeholder in the Obama Administration's American Recovery and Reinvestment Act. The department was allocated $13.61 billion under the act's auspices, and continues to play a major role in the administration's efforts to stabilize the economy in general and the housing market in particular. Information on HUD's involvement can be found at: http://portal.hud.gov/portal/page/portal/HUD/recovery

HUD is also complying with the all USASpending.gov, Regulations.gov, and OMB IT dashboard regulations.

4.8.1.2   Open Government Requirement: Release of 3 High-Value Datasets via Data.gov
4.8.1.3   Leveraging Data.gov, HUD has released 5 high-value datasets to the public in order to increase transparency. These five datasets include:

- All Title VIII fair housing cases filed by the Fair Housing/Equal Opportunity program area since Jan 1, 2006
- Multifamily housing physical inspection scores
- Public housing physical inspections scores
- Public housing inventory
- Performance audits of public housing authorities

Together, they represent some of the Department's most important mission functions, and they present the public with data about HUD's operations, its inventory, and the performance of state, local, and tribal public housing authorities. HUD will explore how these datasets may be integrated with each other, or with other Agencies' datasets, to produce novel ideas and strategies. It is possible that connecting data on public housing inventory with information such as public transport utilization may produce insight into where future public investment may best be directed.

4.8.1.4   Records Management Program
HUD utilizes a robust records management process to properly preserve relevant documentation. The Department follows a three-stage lifecycle:

1. Create record of documentation

2. Enable the maintenance and ongoing use of documentation
3. Archive and/or dispose of unnecessary documentation

The Records Management team provides training and policies to all HUD employees and contractors. More information on HUD's Records Management Program can be found at: http://portal.hud.gov/portal/page/portal/HUD/program_offices/administration/recordsmgmt

4.8.1.5 Freedom of Information Act (FOIA) Program

HUD has been proactive in making documents available to the public and over the past several years has succeeded in reducing its FOIA backlog. At HUD, the median processing time for simple FOIA requests is 30 days, the mode is closer to 20, while the median is 45 days for more complex requests. At the end of HUD's 2009 Fiscal Year, there was a backlog of 406 FOIA requests. This was a 48% reduction from the previous year, and an 85% reduction from two years ago.

In 2009 HUD FOIA processes included 23 steps, making it difficult to meet the regulatory expectation of 20 days for responding to requestors. After initiating a lean six business improvement assessment the number of steps was reduced by 11. This process is being piloted in a headquarters program office and one regional office. The new processes will be evaluated in September for probable implementation across the rest of the Department.

HUD's current FOIA process is captured below:

Figure 10 – HUD's FOIA Process
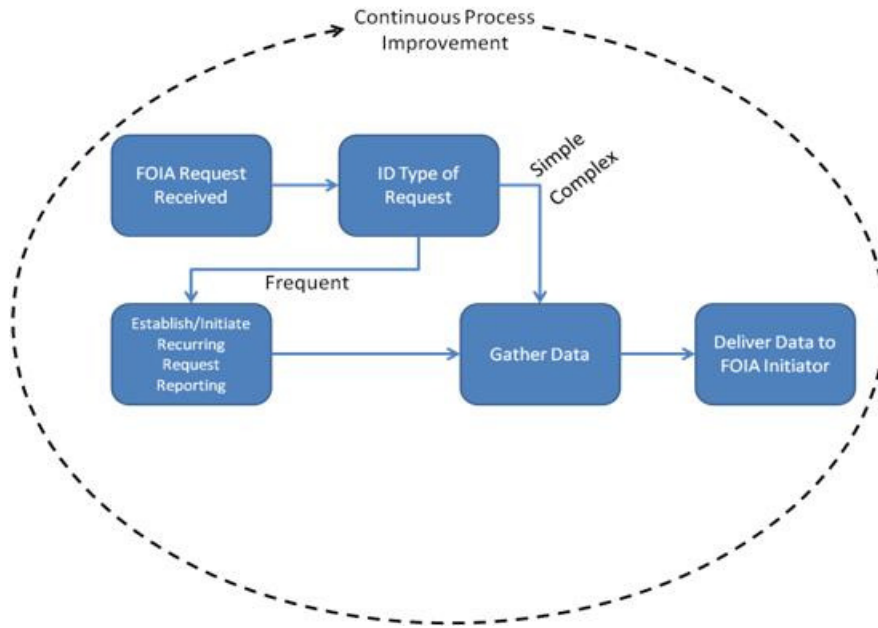
Pursuant to FOIA, 5 USC 552(a)(6)(A)(i), once HUD receives a FOIA request, the Department has 20 working days within which to make a determination on the request unless unusual circumstances exist. Under unusual circumstances, such as an Agency's backlog, or the need to examine a voluminous amount of records required by the request, HUD can extend the 20-day time limit.

In order to better assess the work output of FOIA staff, new performance measures were put in place in 2010. As a result management was better able to pinpoint staff weaknesses and clarify expectations. One employee has been placed on an opportunity to improve plan while others have increased their output. The manager is also tracking error rates to better identify those that are common and lend themselves to systemic solutions.

In May 2010, overtime was made available to all employees. Most employees are working an additional 16 hours each pay period to address their individual backlogs. Finally, management has stepped up its efforts to resolve old complaints that have languished. As a result of all of these measures it is expected that the backlog of 406 that existed at the end of fiscal 2009 will be reduced by 10% or more.

HUD's policy is to process FOIA requests using "multi-track processing," which allows the Department to process FOIA requests on a first-in/first-out basis within each track. HUD places FOIA requests in its routine or complex track based on the amount of work and time involved in processing the request. The criteria for assignment to a specific track are found in HUD's FOIA regulations, 24 CFR 15.105(a), which were published in the Federal Register on January 22, 2001, at 66 FR 6964.

The Office currently utilizes a Frequently Requested Materials section of its website to point users to the most frequent FOIA requests. The minimum threshold for a request to be put into this URL is 3 requests in the last 6 months. The Office has also designated one of its FOIA Specialists to work closely with program staff to identify additional records that can be made available to the public.

The office will explore how to make this process more consumer-friendly. This will include identifying ways that the FOIA office and program areas can better communicate to exchange information and data.

A new organization structure has been established for the Office of Executive Secretariat, which includes FOIA. Requests that come into the office via mail will go through a centralized mail room and a second team leader will be added to the staff.

FOIA/Executive Correspondence

- Executive/Secretary Assistant — Kwiannie Williams
- Office Director — Dolores Cole

Assistant Executive Secretary - FOIA — Vicki Lewis
- Team Leader — Sandra Wright
  - Specialist — Deidra Jenkins
  - Specialist — Denise Brown
  - Specialist — Maura Bush
  - Assistant — Eugenia Harris
- Team Leader — Vacancy
  - Specialist — Joan Gill
  - Specialist — Eugene McGirt
  - Specialist — Marie Perry
  - Specialist — Denise Lenkiewicz

Deputy Office Director — Vacancy
- Mailroom/Rec Team Leader — William Smith
- FOIA Clerk — Stephanie Gray
- Correspondence Clerk — Michelle Key
- Administrative Clerk — Javon Ford
- Record Assist — Towanna Gray-Bentley

Assistant Executive Secretary-Correspondence — Dorothy Fason
- Editor — Howard Rosenburg
- Team Leader — Vacancy
  - Specialist — Nicola Mann
  - Specialist — Marie Linder
  - Specialist — Brittani Grooms
  - Specialist — Bunmi Akinyosoye
  - Specialist — Adrienne Harding
  - Specialist — Cindy Loring
  - Specialist — Angela Parker
  - Intern/transfer — Vacancy

The information system that supports processing of FOIA requests will be upgraded in fiscal 2011. The current system is limited in its capacity to provide reports, necessitating manual gathering of data needed to respond to required reports as well as the tracking of employee performance. The system often requires re-booting to retrieve FOIA requests submitted via PAL. In addition, redacting documents via FMS2 is time consuming; the updated version has a better capability to redact information that will significantly speed up that aspect of responding to requests. The upgraded system is easier to use and will significantly enhance the office's ability to provide accurate, timely reports.

More information can be found at:
http://portal.hud.gov/portal/page/portal/HUD/program_offices/administration/foia

4.8.1.6   Privacy Program

HUD is fully committed to protecting the privacy and security of visitors to its website. HUD only collects detailed personal information from eligible individuals who have affirmatively requested the Department's services. HUD also analyzes aggregate numbers of page hits in order to track the popularity of certain pages and improve the value of its site. However the Department does not gather, request, record, require, collect or track any Internet users' personal information during this process. HUD additionally maintains a variety of physical, electronic, and procedural safeguards to protect the personal information of visitors to its website. More information can be found at:
http://portal.hud.gov/portal/page/portal/HUD/privacy_policy

4.8.1.7   Congressional Requests

HUD's Office of Congressional and Intergovernmental Relations is responsible for coordinating with program areas to ensure the effective and accurate presentation of its views to Congress and other Federal agencies. The Office also cooperates with the Office of General Counsel in developing the Department's position on all relevant legislative matters.

The Office is responsible for ensuring that all testimony and responses to Congressional inquiries are consistent with the Secretary's and the Administration's views, and is additionally tasked with resolving differences with the Office of Management and Budget during the development of the Department's proposed budget and legislative program. More information can be found at:
http://portal.hud.gov/portal/page/portal/HUD/program_offices/gov_relations

4.8.1.8   Use and Handling of Classified Information

HUD does not have the statutory authority to classify or declassify information; therefore, a specific declassification program does not exist.

5 Engagement Initiatives

The Open Government Directive describes engagement as allowing "members of the public to contribute ideas and expertise so that their government can make policies with the benefit of information that is widely dispersed in society." In order to achieve this goal, HUD must create new ways for the public to share ideas with the Department. Additionally, HUD must create incentive structures that allow citizens to see the practical and positive results of their engagement and participation.

HUD's governance structure will play a vital role in prioritizing feedback from the public and determining what value-added comments or ideas are actionable. The Department must improve its customer-centric focus, and identify ways to be more responsive to their needs. The following sub-sections introduce several engagement related projects HUD is currently or will be undertaking. The Department currently conducts many of these activities, but there is room for improvement in making the relevant processes and data more open to public engagement.

5.1 Provide Improved Online Feedback Capabilities for Customers

HUD will create new online capabilities that will allow its customers to quickly and easily provide valuable insight into the Department's processes, activities, and technologies. Suggestions and insight provided to HUD via this tool will not be locked in bureaucratic channels, but swiftly and proactively distributed to the relevant program and support area personnel. These new online capabilities will act as a catalyst for the Department's ongoing efforts of information gathering and citizen engagement, and will make HUD even more welcoming to public feedback

Additionally, this tool will be utilized to improve HUD's online Fair Housing Complaint submission process to make it more user-friendly and less bureaucratic. Numerous public comments on IdeaScale requested that the process be simplified and/or more discoverable.

As part of its efforts to create improved online capabilities, HUD may utilize YouTube videos or other delivery mediums to explain to the general public how to submit complaints online, and it will create a new tracking system that will assign each citizen an anonymous tracking number so that they can easily trace the progress of their complaint. No personally identifiable information (PII) will be collected in the submission of this tracking process, and the identities of petitioners will be protected.

5.2 Provide Online Capabilities for Public Review of HUD Regulations Prior to Implementation

HUD already publishes its rules, regulations, and covenants for public review before they are implemented. However, citizens have expressed, via HUD's Ideas in Action portal, that it is unclear how to direct feedback to the Department. HUD will create a centralized and much more easily navigable website that utilizes an IdeaScale-like interface to allow the public to better engage with proposed rule changes. On this website, citizens will be able to make concrete suggestions that can subsequently be voted either up or down by other users to effectively highlight well-articulated and popular ideas.

This project will enable HUD and other relevant federal, state, and local Agencies to more effectively engage with citizens, and properly review and vet comments that raise significant issues. Additionally,

this website will enable the Department to assess how responsive state and local governments are in responding to concerns raised by the public.

5.3   HUD Ideas in Action: A Strategic Planning and Open Government Tool

During the development of its current strategic plan, the Department launched a web portal called HUD Ideas in Action. This website, and the active engagement with citizens that resulted from its use, allowed HUD to better inform its strategic plan and the processes utilized to develop it by providing direct and substantive input into the strategic focus that the Department should take.

This tool, which also satisfies elements of the Open Government Directive's definition of collaborative tools and processes, allows users to submit ideas and have these ideas voted on by other users. HUD personnel can tailor submissions to address specific Department initiatives or to broader questions about its strategic priorities. Ideas that will improve HUD's mission performance are sent to the appropriate decision making authority, where they are evaluated against specific criteria such as their alignment with HUD's strategic plan, their cost, and their ease of implementation. If an idea is approved, the relevant program or support area become the 'owner' and will be tasked with realization.

After being updated and revitalized, and possibly even merged with HUD's Ideascale site, this site will remain a vital aspect of HUD's engagement efforts, as it provides valuable insight into the needs of its customers, its employees, external stakeholders, and the general public. Continued development of HUD Ideas in Action demonstrates how open government has been and will continue to be a major influence on the Department's strategic planning, and vice versa.

More specific information about the tool can be accessed at:
http://hudideasinaction.uservoice.com/forums/33264-utilize-housing-as-a-platform-for-improving-qualit

5.4   Transforming Rental Assistance

Rental assistance is provided by many public housing agencies, thousands of private owners with Federal contracts, and hundreds of non-profits. HUD does not have a unified approach to interacting with these disparate rental assistance programs. This creates inefficiencies for these organizations, and eligible families must interact with these programs separately, such as adding their names to many different waiting lists. Currently being developed within the Department, the Transforming Rental Assistance (TRA) program intends to provide a uniform way of working with the disparate rental assistance programs by moving their properties toward a uniform funding stream, governed by a single set of rules and regulations, while retaining deep affordability.

Equally important, TRA will help to preserve the millions of units receiving HUD rental assistance by opening them up to other public and private sources of financing to meet their capital needs and ensure their long-term quality through the market discipline brought to bear in mixed finance projects. Additionally, TRA reflects the Department's commitment to enhancing tenant mobility, providing more tenants in HUD-assisted housing the option to 'vote with their feet' if their current housing is poorly operated or if they have the chance to move to a neighborhood of greater opportunity.

HUD is committed to developing this initiative in an open and collaborative manner including public meetings and leveraging webcast technologies. As recently as March 29, 2010, HUD conducted a

webcast entitled "Transforming Rental Assistance: An Informational Webcast for Residents of HUD's Rental Assistance Programs". This webcast was a live presentation by senior HUD leaders in which information on potential policies and program specifics were presented and the senior leadership received questions from the public via email and phone.

One question that was addressed during the webcast was whether HUD is committed to ensuring robust opportunities for residents to participate. HUD was able to immediately address the question by responding that residents would: have a right to organize, be consulted before and during conversion, have access to funding for organizing throughout competitive process, serve on public housing authority (PHA) boards, and participate in the PHA planning process.

As the TRA program evolves, HUD will continue to offer public meetings, webcasts, and other mechanisms to actively engage the public. The Department will also ensure that residents have direct mechanisms to engage with HUD in this important transformation program.

6 Collaboration Initiatives

The Open Government Directive describes collaboration as improving "the effectiveness of Government by encouraging partnerships and cooperation within the Federal Government, across levels of government, and between the government and private institutions." In order to achieve this goal, HUD plans to institutionalize and expand on its existing partnerships with organizations throughout government and the private sector. HUD will also proactively adopt and disseminate best practices that will enable improved efficiency and greater cooperation with the public. The following sub-sections introduce several collaboration related projects that HUD is currently or will be undertaking.

6.1 Provide Tools to Community-Based Non-Profits to Act as Force Multipliers

Community-based non-profits (CBNPs) act as front-line partners to HUD's mission delivery programs, and empowering and supporting their entrepreneurial capabilities is a vital tactic in HUD's strategy for achieving its missions. The Department will make available a suite of tools, guidance, and practices that may help existing and emerging CBNPs incubate, become established, sustain their operations, and improve their overall efficiency and effectiveness. HUD will assess best practices from the venture capital, non-profit development, and association communities to identify the most effective ways that HUD can support the CBNP community. HUD will help incubate existing and emerging CBNPs in order to establish them as force multipliers in their communities, meaning they will increase HUD's ability to achieve its mission and reach its customers through these proxy CBNP groups. As a result, HUD's customers will increasingly receive support from this wider "ecosystem".

Incubate and Establish CBNPs
HUD will help enable communities and interested parties to establish CBNPs based on their unique needs. This support will help speed the establishment of these groups, and the tools may include the aggregation of currently available resources by geographic area, best practices on start-up processes, and points of contact to relevant personnel within HUD. Such resources may be differentiated by the unique mission that a CBNP may be trying to achieve. There are energetic and enthusiastic individuals in the communities and these individuals should receive access to help in organizing to become force multipliers.

Sustain Operations of CBNPs
After initial operations begin, CBNPs must identify ways to bring long-term value to their communities, and satisfy residents' needs, in order to remain relevant. HUD will provide access to a suite of tools, guidance, and best practices that will help these established and emerging CBNPs sustain operations that are effective in serving their individual missions. These may range from simple financial tools and best practices to guidance on developing strategic and tactical plans and tying those plans to their operations and their revenue and grant efforts.

Enable Effectiveness of CBNPs
HUD will provide enablers such as data, maps, and other targeted materials that will provide CBNPs with capabilities that enable them to better meet their own objectives. These enablers will empower community-based non-profits to better manage and focus their operations to help meet their individual goals and objectives.

One specific tool may utilize housing provider (HP) performance data to enable CBNPs to compare housing performance relative to HPs in other geographic areas. This may involve the adoption of the heat-map like tool introduced in section **Error! Reference source not found.** to incorporate multiple layers of information and data that may be useful for each community-based non-profit, along with relevant comparison tools and metrics.

6.2 Utilize the Department of Energy's Weatherization Assistance Program as a Catalyst for Additional Collaboration to Aid HUD's Customers

In May of 2009, HUD and the Department of Energy (DOE) entered into an important partnership that streamlined the application process for the DOE's Weatherization Assistance Program for the residents of HUD-assisted housing. This partnership saw the two departments collaborate closely to reduce duplicative and unnecessary bureaucratic hurdles, support energy efficiency, and more effectively assist the American public. As part of the Open Government initiative, HUD will seek to broaden and expand on this important relationship and find other opportunities for collaboration with the DOE.

6.3 Continue Collaboration with the Federal Communications Commission on Broadband

"The connection between broadband and housing policy is not only a natural fit, it's essential to building the economy of the 21st century."

- Secretary Donovan

HUD recently began collaborating with the Federal Communications Commission (FCC) on issues relating to the expansion of broadband access to lower-income areas and HUD-assisted housing. This collaborative initiative is a testament to the public partnerships that HUD is creating with numerous Federal Agencies in order to address the needs of a 21st century economy. HUD is hopeful that its current relationship with the FCC can be expanded, and that the Department's customers can continue to receive assistance in gaining access to vital broadband services.

6.4 Continue Transportation Related Collaboration with the DOT and EPA

In June 2009, HUD, the Environmental Protection Agency (EPA), and the Department of Transportation (DOT) initiated an unprecedented partnership to help American families gain better access to affordable housing, more numerous and more energy efficient transportation options, and lower overall transportation costs. The partnership takes the form of a high-level interagency task force that seeks to enhance integrated planning and investment, provide a vision for sustainable growth, align HUD, DOT, and EPA programs, and undertake joint research, data collection, and outreach. The Department is confident it can continue to work with its partners to make this relationship even more beneficial to the public.

6.5 Continue General Communication with the Public

Utilizing a wide range of communications tools, HUD's Office of Public Affairs (OPA) strives to keep the American people informed about the Department's mission to sustain homeownership, support community development, and increase access to affordable housing free from discrimination. By pursuing a broad based program of media outreach, OPA ensures that HUD's customers hear directly from key officials about the Department's latest initiatives and goals.

The OPA has embraced new social networking technology, and HUD now has a Twitter feed, a Facebook page, and a YouTube channel. These new tools allow the Department to more effectively collaborate with citizens and inform them about its new and ongoing initiatives.

7 Challenges to Utilizing Open Government

7.1 Implementation Challenges

There are both internal and external challenges to successfully implementing open government within the Department. The following diagram illustrates HUD's main areas of focus in regards to the challenges it faces:

Figure 11 – HUD's Internal and External Challenges
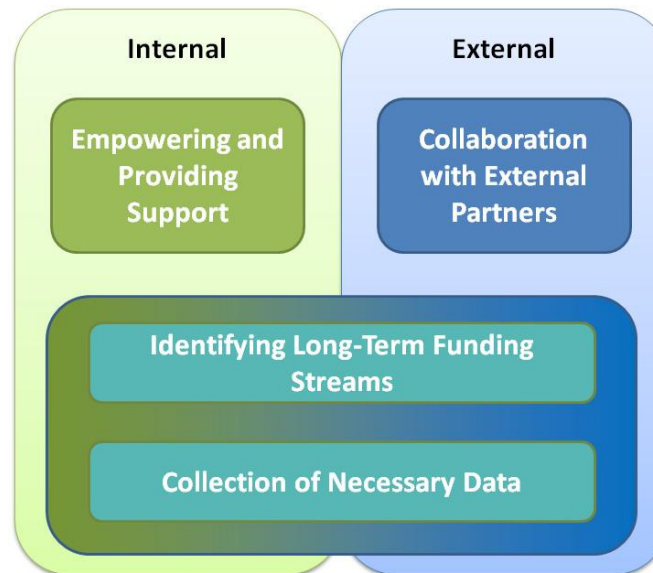
Collaboration with External Partners
Due to the crosscutting nature of many of HUD's open government activities, its relationships with its external partners are of vital importance. From other Federal Agencies to community-based non-profits, HUD will utilize a framework that is mindful of each group's own priorities and goals.

The ultimate goal of this incentive structure is the long-term institutionalization of the external partnerships that facilitate open government. HUD understands that its partners are a diverse group of individuals and organizations, and that it will need to have a flexible and adaptive framework for engaging them on a sustainable basis.

Collection of Necessary Data
HUD realizes that there are datasets vital to the success of its new initiatives that are either available internally within the Department or in the possession of its partner organizations. HUD will work continuously in order to standardize its own internal data collection methods, and to create flexible, adaptive, and sustainable mechanisms for sharing vital data with other Agencies and organizations.

Empowering and Providing Support to its Employees
HUD is dedicated to institutionalizing the cultural changes necessary for the successful implementation of this Open Government Plan. A significant challenge to this goal is empowering managers at all levels to absorb and utilize open government concepts in their daily and strategic business activities. Their

subordinates must be able to, for example, identify archaic or inefficient policies, and then be encouraged to elevate them to the relevant stakeholders within the Department.

Indentifying Long-Term Funding Streams
HUD understands that the key to the long-term success of open government is the identification of sustainable long-term funding streams. The Department will work diligently with both its internal stakeholders and its external partners to formulate a clear understanding on the budget expenditures that are necessary to fund open government activities.

7.2 Policy Management

HUD's implementation of open government will require policy changes in areas ranging from the use of social media to data quality and security. Due to the rapid evolution of technology, HUD will establish a continuous review process in order to keep its policies and available tools up to date. The following lists HUD's main areas of focus in regards to policy management:

Accessibility
Open government must include people with disabilities. Federal law requires that programs and resources provide comparable access and equivalent communications to people with disabilities, including alternative methods and formats, unless it would be an undue burden on the agency.

Acquisition
To acquire services in support of this initiative, HUD must follow policies identified in the Federal Acquisition Regulation (FAR).

Confidentiality
Web pages or any other open government related activities or processes must not publicly release sensitive information. Due to the nature of open government, it will be impossible to vet all data as not containing any sensitive information, especially when information from multiple agencies is combined. As is the case with Data.gov, HUD will retain the right to redact any previously published data or processes if such a situation occurs. In such cases, HUD will convene a privacy working group to investigate how the compromise happened, and in the case of inter-Agency compromises, establish necessary partnerships with other Agencies to convene a 'lessons learned summit.'

Data Quality
Due to HUD's reliance on data for many of its missions, HUD has an extensive data quality policy. In order to release data in a timely manner, HUD will investigate the necessary governance and policy changes that must be made in order to ensure the public has the most accurate and up-to-date information. Data standards will still comply with all Federal laws and regulations as consistent with the Data Quality Act.

Employee Behavior/Ethics
Due to the direct contact that many HUD employees have with the public, standards and guidelines must be set in regard to the professional behavior that they must maintain, including in on-line venues.

Enterprise Architecture
Enterprise architecture will play a key role in developing the necessary plans to align open government efforts with modernization roadmaps and setting realistic timelines to implementation.

Infrastructure

Open government solutions, especially technology-based ones, will place an increased load on HUD's Information Technology (IT) infrastructure. HUD's OCIO will investigate necessary policy changes and IT infrastructure investments to ensure the Department will have the necessary resources to launch new open government solutions.

Information Collection

HUD currently has an extensive information collection operation and mandate due to its interaction with many groups outside of the Federal government. The Department will closely monitor the Office of Management and Budget's (OMB) efforts to modify the Paperwork Reduction Act exemption process to align with 21st century delivery mediums. It will also investigate its own avenues to obtain necessary PRA exemptions in order to reduce time to implementation for open government solutions.

Intellectual Property

Due to the two-way feedback mechanism of open government, intellectual property issues may become a significant impediment to HUD's open government solutions. It will work closely with its Office of General Counsel in order to establish relevant policies that anticipate the kinds of issues that may arise from the novel ways in which it will receive information, suggestions, and ideas from the public. Additionally, HUD will identify best practices from across the Federal government in this realm and seek to establish and participate in inter-Agency working groups to develop unified policies across cross-functional domains to reduce systemic risk in intellectual property issues across the Federal government.

Open Formats

HUD will utilize open formats that are platform independent, machine readable, and made available to the public without restrictions that would impede the re-use of that information. All data will have relevant metadata that is standardized across the Department, and proper context and use instructions will be given to HUD's data consumers and customers in order to provide guidelines on what are the proper and improper ways to utilize each dataset.

Privacy

HUD realizes that a potentially significant impediment to the collection and use of information or data received through open government is the public's worry that privacy information may somehow be collected. HUD currently has clear policies for collecting and managing personally identifiable information (PII), and what solicitation mediums or activities allow this collection. These policies will be modified as necessary to fit with HUD's open government needs.

Prizes

HUD will modify and update its existing policies to enable open government initiatives to incentivize the public and other stakeholders via monetary and non-monetary prizes and competitions. These competitions encourage the public to engage in the development of innovative tools and technological solutions. The DC government pioneered this type of competition with the successful Apps for Democracy contest in 2008. Since then, municipalities and governments from New York City to Finland have held similar contests. HUD will sponsor an "Apps for Cities" contest as a joint venture between the Department's PD&R and OPA organizations. This competition will be an opportunity to showcase some of the innovative work being done at HUD as well as the creativity and skills of the public programming community. The purpose of this contest is to make HUD data more useful and usable to

the general public, state and local governments and the Department itself. The framework for the competition is as follows:

Data Sources
Several HUD datasets are currently cataloged on data.gov. These include a list of all the Title VIII fair housing cases filed by FHEO from January 1, 2006, public and multi-family housing inspection score, Section Eight Management Assessment Program data and a PHA inventory. PD&R will work with OPA to identify more high-value data sets that could be added to the catalog prior to the launch of the contest. In addition, we will solicit feedback from interested developers on what data they would like to see made public for use in the competition.

Rules
Placing too many restrictions on what applicants can submit unnecessarily stifles creativity and innovation. As a result entrants will simply follow one rule; to use at least one data source from HUD's section of data.gov to build a working application of some kind.

Timeline
From start to conclusion, the Apps for Cities contest will take four months. The color coding in the following table shows distinctions in effort over the course of the contest. Lighter colors indicate building or planning periods with lighter resource requirements. Darker colors indicate the completion of components or heavier resource allocations.

		Month	1				2				3				4			
		Week	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
Website Creation																		
Design																		
Copywriting																		
Development																		
Project Management and Strategy																		
Marketing to Developers (Outreach)																		
Key Marketing Components			1			2			3				4				5	
Competition Open for Submission																		
Judge Recruitment																		
Initial Screening																		
Apps Posted Publicly																		
Public Voting for "People's Choice"																		
Awards Ceremony (Event Planning)																		
Results of Contest Marketing																		

40

<u>**Website Creation**</u>
The website will be collaboratively designed and developed by PD&R and OPA to market the contest and serve as a link to published open data and associated applications developed for the contest.

All applications will be made public once screened for viability and appropriateness. Bloggers and the media will be encouraged to write about new apps as they are posted.

<u>**Marketing to Developers**</u>
Extensive marketing to developer networks will be key to ensuring the success of the contest. Our marketing plan will focus on building community through collaboration and learning as well as facilitating public recognition for developers and for HUD's efforts in the open data realm. Another key component of the marketing plan is to solicit feedback on the types and format of data being offered and to respond and act on that feedback. This will generate significant buzz if the developer community feels that their requests are being listened to and acted on quickly. This will also help brand HUD as responsive and willing to engage with citizens and developers. HUD's Twitter feed and Facebook account will also be used to maximize the exposure of this event.

Key Marketing Components:
- **Component 1:** Establishing a contest website and distributing a press release announcing the contest.
- **Component 2:** Kick off the contest with a one day conference co-hosted by Next American City similar to the Open Cities gathering held in October of 2009. This event will allow personal engagement with interested technology developers, answer questions about the contest in person and, hear about initial ideas for applications. We will plan for between 50 and 100 attendees.
- **Component 3 and 4:** Host additional meetings of interested developers either at HUD or at other technology/urban issues conferences. This will be an opportunity to reach new audiences and keep the contest at the top of developers' minds.
- **Component 5:** Awards ceremony. Following the awards ceremony, we will ensure that the relevant bloggers, reporters and people of influence in the technology community know about the results. The two week period following the awards ceremony will be spent actively engaging with those who have an interest in the results.

<u>**Judging**</u>
Judges will be a panel of HUD officials, technology leaders and academics. Judges will be asked to spread the word about the contest as well as providing an expert review of submitted applications. Ideally, judges will be permitted to provide entrants with feedback for further refinement of their submission prior to the contest deadline. This will ensure higher quality applications that better meet the needs of the public and Department. Judgement criteria will be based on:
- Usefulness to HUD and the public
- Usefulness to other government entities

- Appeal from a usability perspective
- Inventive and original in nature.

Security

HUD will continue to ensure its IT security policy is compliant with the Federal Information Security Management Act (FISMA) and National Institute of Standards and Technology (NIST) standards. As previously stated under 'Privacy' above, a situation may arise where a HUD dataset merged with another Agency's dataset could reveal privacy or security issues. HUD will deal with any such issues on a case-by-case basis, and set policy for any recurring scenarios that may arise from such analysis.

Terms of Service/Terms of Use

Terms of Service (TOS) and Terms of Use (TOU) establish the agreement between the provider and the Government for use of, for example, social media tools such as Facebook. Many provider TOS agreements are not acceptable for Government use unless modified. Even when common terms have been negotiated, legal and CIO review must be obtained prior to use to ensure HUD policies and guidelines are not nullified or superseded by the TOS or TOU.

Web/Internet

Any information posted on the Web must align with HUD's web policy, and all data presented will be Section 508 compliant. This may include the use of captions in videos for the hearing impaired, or any number of solutions to address accessibility issues on the Internet.